**The City of New York**
**BUSINESS INTEGRITY COMMISSION**
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# DECISION OF THE BUSINESS INTEGRITY COMMISSION DENYING THE REGISTRATION RENEWAL APPLICATION OF MANCO EQUIPMENT RENTAL CO. INC. TO OPERATE AS A TRADE WASTE BUSINESS

## I. PRELIMINARY STATEMENT

Manco Equipment Rental Co., Inc. ("Manco" or the "Applicant") has applied to the New York City Business Integrity Commission ("Commission"), formerly known as the New York City Trade Waste Commission, for renewal of an exemption from licensing requirements and a registration to operate a trade waste business "solely engaged in the removal of waste materials resulting from building demolition, construction, alteration or excavation" – a type of waste commonly known as construction and demolition debris, or "c & d." See Title 16-A of the New York City Administrative Code ("Admin. Code"), §16-505(a).

On January 26, 2015, the staff issued and served the Applicant with Notice of the Grounds to Recommend the Denial of the Registration Renewal Application of Manco be denied ("Notice"). The Applicant was granted ten business days to respond, until February 12, 2015. See 17 Rules of the City of New York §2-08(a). On February 12, 2015, the Applicant submitted a two page response from its attorney and eight pages of exhibits (collectively, "Response"). See February 12, 2015 Response. In the Response, the Applicant did not dispute any of the facts as stated in the Notice. See Response. Instead, the Applicant admitted that "the only items that remain are the tax liens," and [the taxes owed] are not small amounts." See Response at 2. Thus, the Applicant's attorney requested "an additional one hundred twenty (120) days to liquidate assets in order to pay taxes that it admittedly owes. See Id. On February 17, 2015, the Commission's staff responded to the Applicant's request for an extension of time by asking the Applicant's attorney to provide before the close of business on February 20, 2015: (1) a list that identifies and describes the property that the Applicant intends to liquidate; (2) the value of the property; and (3) a detailed description of the Applicant's plan to liquidate this property, including steps that have already been taken. See February 17, 2015 letter from the Commission's staff to the Applicant's attorney. The Applicant did not respond to the staff's February 17, 2015 letter. Based upon the record as to the Applicant, the Commission now denies Manco's exemption renewal application because the Applicant lacks good character, honesty and integrity based on the following independently sufficient reasons:

A. The Applicant and the Applicant's Affiliates Have Failed to Pay Fines and Judgments That Are Directly Related to the Applicant's Business that are Owed to the Internal Revenue Service, the State of New York, the City of New York, the Workers' Compensation Board of the State of New York, and the Commissioner of Labor of the State of New York.

B. The Applicant Knowingly Failed to Provide Information and Documentation Required by the Commission.

## II. BACKGROUND AND STATUTORY FRAMEWORK

Every commercial business establishment in New York City must contract with a private carting company to remove and dispose of the waste it generates. Historically, the private carting industry in the City was operated as a cartel controlled by organized crime. As evidenced by numerous criminal prosecutions, the industry was plagued by pervasive racketeering, anticompetitive practices and other corruption. See e.g., United States v. International Brotherhood of Teamsters (Adelstein), 998 F.2d 120 (2d Cir. 1993); People v. Ass'n of Trade Waste Removers of Greater New York Inc. et al., Indictment No. 5614/95 (Sup. Ct. N.Y. Cty.); United States v. Mario Gigante et al., No. 96 Cr. 466 (S.D.N.Y.); People v. GNYTW, 701 N.Y.S.2d 12 (1st Dep't 1999). The construction and demolition debris removal sector of the City's carting industry has also been the subject of significant successful racketeering prosecutions. See United States v. Paccione, 949 F.2d 1183, 1186-88 (2d Cir. 1991), cert. denied, 505 U.S. 1220 (1992); United States v. Cafra, et al., No. 94 Cr. 380 (S.D.N.Y.); United States v. Barbieri, et al., No. 94 Cr. 518 (S.D.N.Y.); United States v. Caccio, et al., Nos. 94 Cr. 357,358, 359, 367.

The Commission is charged with, *inter alia*, combating the pervasive influence of organized crime and preventing its return to the City's private carting industry, including the construction and demolition debris removal industry. Instrumental to this core mission is the licensing scheme set forth in Local Law 42, which created the Commission and granted it the power and duty to license and regulate the trade waste removal industry in New York City. NY Admin. Code §16-505(a). It is this licensing scheme that continues to be the primary means of ensuring that an industry historically plagued with corruption remains free from organized crime and other criminality, and that commercial businesses that use private carters can be ensured of a fair, competitive market.

Pursuant to Local Law 42, a company "solely engaged in the removal of waste materials resulting from building demolition, construction, alteration or excavation," commonly known as construction and demolition debris, or "C & D" removal, must apply to the Commission for an exemption from the licensing requirement. Id. If, upon review and investigation of an exemption application, the Commission grants the applicant an exemption from the licensing requirement, it issues the applicant a Class 2 registration. Id. Before issuing such registration, the Commission must evaluate the "good character, honesty and integrity of the applicant." Id. at §16-508(b). The New York City Administrative Code provides an illustrative list of relevant factors for the Commission to consider in making a licensing or registration decision:

> 1. failure by such applicant to provide truthful information in connection with the application;
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> 2. a pending indictment or criminal action against such applicant for a crime which under this subdivision would provide a basis for the refusal of such license, or a pending civil or administrative action to which such applicant is a party and which directly relates to the fitness to conduct the business or perform the work for which the license is sought, in which cases the commission may defer consideration of an application until a decision has been reached by the court or administrative tribunal before which such action is pending;
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> 3. conviction of such applicant for a crime which, considering the factors set forth in section seven hundred fifty-three of the correction law, would provide a basis under such law for the refusal of such license;

4. a finding of liability in a civil or administrative action that bears a direct relationship to the fitness of the applicant to conduct the business for which the license is sought;

5. commission of a racketeering activity or knowing association with a person who has been convicted of a racketeering activity, including but not limited to the offenses listed in subdivision one of section nineteen hundred sixty-one of the Racketeer Influenced and Corrupt Organizations statute (18 U.S.C. §1961 et seq.) or of an offense listed in subdivision one of section 460.10 of the penal law, as such statutes may be amended from time to time, or the equivalent offense under the laws of any other jurisdiction;

6. association with any member or associate of an organized crime group as identified by a federal, state or city law enforcement or investigative agency when the applicant knew or should have known of the organized crime associations of such person;

7. having been a principal in a predecessor trade waste business as such term is defined in subdivision a of section 16-508 of this chapter where the commission would be authorized to deny a license to such predecessor business pursuant to this subdivision;

8. current membership in a trade association where such membership would be prohibited to a licensee pursuant to subdivision j of section 16-520 of this chapter unless the commission has determined, pursuant to such subdivision, that such association does not operate in a manner inconsistent with the purposes of this chapter;

9. the holding of a position in a trade association where membership or the holding of such position would be prohibited to a licensee pursuant to subdivision j of section 16-520 of this chapter;

10. failure to pay any tax, fine, penalty, or fee related to the applicant's business for which liability has been admitted by the person liable therefor, or for which judgment has been entered by a court or administrative tribunal of competent jurisdiction.

Id. at §509(a)(i)-(x). Additionally, the Commission may refuse to issue a license or registration to any applicant who has "knowingly failed to provide information or documentation required by the Commission...or who has otherwise failed to demonstrate eligibility for a license. Id. at §509(b). The Commission may refuse to issue a license or registration to an applicant when such applicant was previously issued a license which was revoked or not renewed, or where the applicant "has been determined to have committed any of the acts which would be a basis for the suspension or revocation of a license." Id. at §509(c). Finally, the Commission may refuse to issue a license or registration to any applicant where the applicant or its principals have previously had their license or registration revoked. Id. at §509(d).

An applicant for a private carting license (including construction and demolition) has no entitlement to and no property interest in a license or registration and the Commission is vested with broad discretion to grant or deny a license or registration application. Sanitation & Recycling Industry, Inc., 107 F.3d at 995; see also Daxor Corp. v. New York Dep't of Health, 90 N.Y.2d 89, 98-100, 681 N.E.2d 356, 659 N.Y.S.2d 189 (1997). NY Admin. Code § 16-116.

## III. FACTS

Manco applied to the Commission for an exemption from licensing requirements and a registration to operate as a trade waste business that removes construction and demolition debris. See Registration Application ("Application"). The Application disclosed Enrico Manetta as the sole principal. See Registration Application at 9. On or about April 16, 2006, the Commission granted the Applicant a trade waste registration. See Registration Order. The Applicant's registration was effective for two years, and expired on March 31, 2008. See id. On or about February 19, 2008, the Applicant filed its first Renewal Application with the Commission. See First Renewal Application. The Commission granted the First Renewal Application and authorized the Applicant to operate for another two years, until March 31, 2010. On May 5, 2010, the Applicant filed its second Renewal Application with the Commission. See Second Renewal Application. The Applicant was authorized to operate pending a review of that application. On March 22, 2012, the Applicant filed its Third Renewal Application with the Commission. See Third Renewal Application. The Commission granted the Third Renewal Application and authorized the Applicant to operate for another two years, until March 31, 2014. On March 28, 2014, the Applicant filed its Fourth Renewal Application with the Commission, which is the subject of this Notice. See Fourth Renewal Application.

The Commission's background investigation of the Applicant in connection with the Fourth Renewal Application establishes that the Applicant is closely tied to Manco Enterprises, Inc. ("Manco Enterprises") and Manetta Enterprises, Inc. ("Manetta Enterprises."). In addition to being the sole owner of Applicant, principal Enrico Manetta is also the Chief Executive Officer of Manco Enterprises, and is the Chief Executive Officer of Manetta Enterprises. See New York State Department of State printouts for Manco Enterprises and Maneetta Enterprises. Further, Manco Enterprises, Manetta Enterprises, and the Applicant are all located at 44-17 54th Drive, Maspeth, NY. See Fourth Renewal Application at 7. Finally, besides sharing the same principal and business address, at least one of the Applicant's vehicles is registered to Manetta Enterprises. See Fourth Renewal Application at 16. In addition, the Applicant's Renewal Application fee was paid by check from Manco Enterprises. See Id. at 25. In Questions 16 and 17 of the Registration Application the Applicant even disclosed that all three "related companies are 100% owned by Enrico Manetta," and that the vehicle operators "are employees of related corporations listed above (Manetta Enterprises and Manco Enterprises)." See Registration Application at 3. Thus, the Applicant is closely intertwined with Manco Enterprises and Manetta Enterprises.

In addition to establishing the inextricable connection between the Applicant and Manco Enterprises and Manetta Enterprises, the Commission's background investigation also revealed:

- three New York State tax liens filed against Manco Enterprises that total $747,926.58;
- one New York State tax lien filed against Enrico Manetta individually and as a responsible person of Manco Enterprises in the amount of $218,889.10;

- one open arrest warrant issued by New York County Criminal Court against driver Piotr Kolodynski;

- three Environmental Control Board ("ECB") summonses (two against Manco, and one against Manetta Enterprises, Inc.) that total $9,450.00

The Commission's staff requested information and documentation from the Applicant on numerous occasions and has granted numerous extensions of time for compliance. Throughout this process the Applicant has provided only partial responses or no response at all. The Commission's staff initially contacted the Applicant by letter dated June 30, 2014 to notify the Applicant about the state tax liens, open arrest warrant for employee Piotr Kolodynski, and ECB violations. See June 30, 2014 letter from Commission staff to the Applicant. The Commission's staff extended a deadline of July 21, 2014 for the Applicant to provide proof that the liens filed by the State of New York had been satisfied or otherwise resolved, that the warrant had been vacated or otherwise resolved, and that the ECB summonses had been satisfied or otherwise resolved. See id.

By facsimile dated July 21, 2014, the Applicant's attorney responded to the Commission and stated that one New York State tax lien in the amount of $218,990.10 had been resolved (by providing copies of two cancelled checks with handwritten Warrant ID's corresponding to the $218,990.10 tax lien). In addition, the Applicant's attorney stated (and provided proof to the Commission) that the open arrest warrant against Piotr Kolodynski had been vacated. The facsimile made no mention and did not provide any proof that the Applicant was working to resolve the other three New York State tax liens that total $747,926.58.[1] See July 21, 2014 facsimile from the Applicant's attorney to Commission staff.

By facsimile dated August 4, 2014, the Applicant's attorney provided proof that the three outstanding ECB summonses had been resolved. The Applicant's attorney also stated that her client was "working on obtaining the proper proof confirming the tax liens have been satisfied." See August 4, 2014 facsimile from the Applicant's attorney to Commission staff.

By letter dated August 5, 2014, the Commission's staff extended the time for which the Applicant was required to provide the previously requested documentation and information. The Commission's staff extended a deadline of August 19, 2014, and directed the Applciant to provide "documentation (in addition to the cancelled checks previously provid[ed])...that the New York State tax lien... in the amount of $218,889.10... ha[d] been satisfied or otherwise resolved." See August 5, 2014 letter from Commission's staff to the Applicant's attorney. In addition, the Commission's staff again requested proof that the additional three New York State tax liens that total $747,926.58 had been satisfied or otherwise resolved. See id.

By facsimile dated August 19, 2014, the Applicant's attorney responded to the Commission's August 5, 2014 letter by providing proof that the New York State tax lien in the amount of $218,889.10 had been satisfied. Additionally, the Applicant's attorney stated, without providing any proof, that her client was "working with his accountant and the State Tax Department regarding the remaining liens...," and requested an extension of time to "provide information as to those liens." See August 19, 2014 facsimile from the Applicant's attorney to Commission's staff.

[1] The Applicant's attorney additionally stated that it was "working on resolving the three outstanding ECB summonses." See July 21, 2014 facsimile from the Applicant's attorney to Commission staff.

Again, by letter dated August 21, 2014, the Commission's staff granted an extension of time for the Applicant to provide the previously requested documentation and information. The Commission's staff extended the deadline to September 4, 2014, and specifically directed the Applicant to provide "proof of any Offers in Compromise or communications with the State Tax Department towards resolution of the outstanding liens" if the Applicant did not have a payment plan yet in place. See August 21, 2104 letter from Commission's staff to the Applicant's attorney.

By facsimile dated September 4, 2014, the Applicant's attorney responded to the Commission's August 21, 2014 letter by stating that the Applicant's accountant was "in contact with the NYS Tax Department." See September 4, 2014 facsimile from the Applicant's attorney to Commission staff. Yet, the Applicant did not provide proof of these communications with the State tax authority nor any other proof that it was working towards resolution of the outstanding liens. By letter dated September 8, 2014, the Commission's staff requested proof of any Offer in Compromise or communications with the tax authority. The Commission's staff extended another deadline until September 24, 2014. See September 8, 2014 letter from Commission staff to the Applicant's attorney.

By facsimile dated October 3, 2014, the Applicant's attorney responded to the Commission's staff's September 8, 2014 letter, again stating that the Applicant's accountant was "working with NYS on an installment agreement for the outstanding tax liabilities." See October 3, 2014 facsimile from the Applicant's attorney to Commission Staff. This time, the Applicant's attorney provided as proof, a letter from the Applicant's accountant that states that the Applicant is "in the process of establishing an installment agreement." See id. The Applicant did not provide any actual proof that it or its representatives were actually corresponding with the tax authorities.

On October 10, 2014, the Commission's staff sent another request for information and documentation in a letter marked, "**Final Notice**." See October 10, 2014 letter from Commission staff to the Applicant's attorney. The Applicant's attorney was extended a final deadline of October 27, 2014, and told that its failure to provide the requested documentation may result in the denial of the Applicant's renewal application. See id. The Applicant's attorney responded by stating that "there are no outstanding tax warrants or obligations against principal Enrico Manetta." See October 27, 2014 facsimile from the Applicant's attorney to Commission staff. In its response, the Applicant's attorney again enclosed a letter from the Applicant's accountant stating that "there are no outstanding tax warrants or tax obligations on Enrico Manetta." See id.

After reviewing the Applicant's representation, the Commission's staff conducted another judgment and lien search. According to the judgment and lien search conducted on November 10, 2014, the following judgments and liens – totaling $8,877,047.82– have been docketed against Manco Enterprises, Inc. and Manetta Enterprises, Inc.:

Manco Enterprises, Inc.:

| Creditor | Filing/Serial Number | Filing Date | Amount |
|---|---|---|---|
| Internal Revenue Service | 102689714 | 11/09/14 | $4,333,390.00 |
| Internal Revenue Service | 201205100265844 | 05/10/2012 | $1,860,146.00 |
| Internal Revenue Service | 201112120662956 | 12/12/14 | $1,136,845.00 |
| Internal Revenue Service | 107934614 | 11/09/14 | $622,508.68 |

| | | | |
|---|---|---|---|
| State of New York | 1675966 | 04/04/12 | $408,494.38[2] |
| State of New York | 1647881 | 01/18/12 | $200,547.99[3] |
| State of New York | 1614268 | 10/04/11 | $138,884.21[4] |
| Comm. of Labor of the State of N.Y. | 1572100 | 06/02/11 | $31,296.05 |
| Workers' Comp. Board of N.Y. State | 2283912 | 12/11/06 | $31,250.00 |
| Internal Revenue Service | 201203060130389 | 03/06/12 | $24,123.00 |
| Comm. of Labor of the State of N.Y. | 1508429 | 11/19/10 | $17,643.85 |
| State of New York | 1509635 | 11/23/10 | $11,716.43 |
| State of New York | 002043547 | 06/17/04 | $10,816.00 |
| Internal Revenue Service | 201205220289306 | 05/22/12 | $7,803.00 |
| City of New York | 1513871 | 12/07/10 | $4,795.95 |
| Comm. of Labor of the State of N.Y. | 1558072 | 04/11/11 | $4,341.29 |
| Comm. of Labor of the State of N.Y. | 1674363 | 03/29/12 | $3,928.54 |
| Comm. of Labor of the State of N.Y. | 1630940 | 11/22/11 | $3,876.34 |
| City of New York | 1343848 | 04/15/09 | $416.56 |

Manetta Enterprises, Inc.:

| Creditor | Filing/Serial Number | Filing Date | Amount |
|---|---|---|---|
| Workers' Comp. Board of N.Y. State | 1902010 | 06/18/14 | $16,000.00 |
| Comm. of Labor of the State of N.Y. | 1932211 | 10/20/14 | $6,309.55 |
| State of New York | 001429259 | 02/06/10 | $1,915.00 |

See Judgment and Lien Search Results dated November 10, 2014. As of the date of this Notice, the abovementioned judgments remain open and unpaid.

Therefore, in addition to the three (3) state tax liens about which the Applicant was notified in letters dated June 30, 2014, August 5, 2014, August 21, 2014, September 8, 2014, and October 10 2014, the Applicant's closely affiliated companies owe an additional $8,129,121.24 to New York State, New York City, the Commissioner of Labor of the State of New York, the Workers' Compensation Board of the State of New York, and the federal tax authorities.

Finally, despite the numerous opportunities previously afforded to the Applicant over the course of several months to respond to the Commission's requests for information and documentation, by letter dated November 26, 2014, Commission's staff sent another letter titled "**Final Notice**" to the Applicant's attorney. See November 26, 2014 letter from Commission's staff to the Applicant's attorney. In that letter, the Commission again requested that the Applicant produce the outstanding documentation requested in its letters dated June 30, 2014, August 5, 2014, August 21, 2014, September 8, 2014, and October 10, 2014. The Commission's staff furthermore directed the Applicant to provide proof of satisfaction or resolution of the additional judgments and liens found in the Commission's

[2] In its letters dated June 30, 2014, August 5, 2014, August 21, 2014, September 8, 2014, and October 10 2014, Commission's staff requested proof that this State Tax lien had been satisfied or resolved. As of the date of this notice, no proof has been received by the Commission.

[3] In its letters dated June 30, 2014, August 5, 2014, August 21, 2014, September 8, 2014, and October 10 2014, Commission's staff requested proof that this State Tax lien had been satisfied or resolved. As of the date of this notice, no proof has been received by the Commission.

[4] In its letters dated June 30, 2014, August 5, 2014, August 21, 2014, September 8, 2014, and October 10 2014, Commission's staff requested proof that this State Tax lien had been satisfied or resolved. As of the date of this notice, no proof has been received by the Commission.

November 10, 2014 judgment and lien search. The Commission's staff further directed the Applicant to "provide proof of any Offers in Compromise or proof of communications with the tax authorities...towards resolution of the outstanding debts" if the Applicant had no payment plan yet in place. See November 26, 2014 letter from Commission's staff to the Applicant's attorney. The Commission's staff extended a final deadline of December 12, 2014 for the Applicant to provide the Commission with the requested documentation. See id.

By facsimile dated December 19, 2014, the Applicant's attorney responded to the Commission's November 26, 2014 letter providing correspondence with the Applicant's accountant, Mark Stone from Sales Tax Defense LLC. In that letter the accountant states that he is "handling settling up payment plans with the Department [of Taxation and Finance], the IRS and the DOL for [Manco Contracting Co. Inc.]." See December 19, 2014 facsimile from Applicant's attorney to Commission's staff. The accountant additionally enclosed an unsigned and undated Form 911 and attachment which references Manco Contracting Co. Inc.[5] See id.

By letter dated December 22, 2014, Commission's staff acknowledged receipt of the December 19, 2014 facsimile from the Applicant's attorney. The letter noted that the facsimile only refers to "Manco Contracting Co. Inc." despite the Commission's numerous requests for documentation and information regarding Manco Enterprises, Inc. and Manetta Enterprises, Inc. The letter also noted that the accountant had failed to include a signed and dated Form 911. Both the Applicant and its attorneys failed to respond. As of the date of this notice, the Applicant has not only failed to provide the Commission with all of the requested information and documentation but has outstanding debts totaling $8,877,047.82.

## IV. Basis for Denial

### A. The Applicant and the Applicant's Affiliates Have Failed to Pay Fines and Judgments That Are Directly Related to the Applicant's Business that are Owed to the Internal Revenue Service, the State of New York, the City of New York, the Workers' Compensation Board of the State of New York, and the Commissioner of Labor of the State of New York.

The commission may refuse to issue a license to an applicant "upon the failure of the applicant to pay any tax, fine, penalty, fee related to the applicant's business...for which judgment has been entered by a[n] ... administrative tribunal of competent jurisdiction..." See Admin. Code §16-509(a)(x); see also §16-509(c)(ii); see also §16-513(a)(iv).

As of the date of this notice, the Applicant and the Applicant's affiliates have failed to resolve $8,877,047.82 in judgments and liens filed by the Internal Revenue Service, the State of New York, the City of New York, the Workers' Compensation Board of the State of New York, and the Commissioner of Labor of the State of New York. On multiple occasions, the Commission's staff informed the Applicant and the Applicant's attorneys that it owed numerous unsatisfied debts to governmental entities. Despite these warnings, the debts remain unsatisfied. The Applicant did not dispute this point. For this independently sufficient reason, this Renewal Application is denied.

[5] The documentation provided by the accountant to Commission's staff only references "Manco Contracting Co. Inc.," however, the Commission's letters requested proof of satisfaction of numerous debts for "Manco Enterprises, Inc." and "Manetta Enterprises, Inc."

B. **The Applicant Knowingly Failed to Provide Information and Documentation Required by the Commission.**

"The commission may refuse to issue a license or registration to an applicant for such license or an applicant for registration who has knowingly failed to provide the information and/or documentation required by the commission pursuant to this chapter or any rules promulgated pursuant hereto." See Admin. Code §16-509(b).

Although the Applicant has provided the Commission's staff with some of the information and documentation, ultimately the Applicant has failed to provide all of the information and documentation requested. Despite repeated attempts by the Commission's staff, the Applicant has failed to provide proof of satisfaction or other resolution of the outstanding judgments and liens owed to governmental entities. Moreover, the Applicant also failed to provide adequate proof to establish that it was addressing all of the judgments and liens filed against it and its related companies. In the Response, the Applicant requested an additional one hundred twenty (120) days to liquidate property in order to pay the substantial debts it owes. Although the Commission's staff asked the Applicant to provide the Commission with additional information regarding the claim that the Applicant was in the process of addressing the debts, the Applicant failed to respond.

The Applicant has "knowingly failed to provide the information" required by the Commission by failing to fully respond to the Commission's repeated requests for information and/or documentation. The Applicant has not and cannot dispute this point. For this independently sufficient reason, this Renewal Application is denied.

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## V. CONCLUSION

The Commission is vested with broad discretion to issue a license or refuse to grant an exemption from the license requirement and issue a registration in lieu of a license, to any applicant who it determines to be lacking in good character, honesty and integrity. The record as detailed above demonstrates that the Applicant falls short of that standard. Accordingly, based on the above independently sufficient reasons, the Commission denies Manco Equipment Rental Co. Inc.'s exemption renewal application and registration.

This exemption/registration denial is effective immediately. Manco Equipment Rental Co. Inc. may not operate as a trade waste business in the City of New York.

Dated: March 6, 2015

THE BUSINESS INTEGRITY COMMISSION

Daniel D. Brownell
Commissioner and Chair

Commissioner Kathryn Garcia
Department of Sanitation

Commissioner Mark Peters
Department of Investigation

Senior Director of Policy Shira Gans
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Department of Consumer Affairs

Deputy Commissioner Andrew Schwartz
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Inspector John Denesopolis
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New York City Police Department